

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**PAMELA D. VAUGHN, as
Administratrix of the Estate of
JOHN H. VAUGHN, Deceased,**

Plaintiff,

V.

Case No. 1:22-cv-00204

**JOHN DEERE COMPANY, A
CORPORATION; JOHN DEERE
CONSTRUCTION & FORESTRY, INC.;
DEERE & COMPANY, INC.; BEARD
EQUIPMENT COMPANY, INC.; BEARD
EQUIPMENT COMPANY; BEARD
RENTAL & EQUIPMENT, INC.,**

Defendants.

DEFENDANTS DEERE & COMPANY AND
JOHN DEERE CONSTRUCTION & FORESTRY COMPANY'S
RULE 7.1 CORPORATE DISCLOSURE STATEMENT

Pursuant to Fed. R. Civ. P. 7.1, Defendants Deere & Company, improperly identified as Deere & Company, Inc., and John Deere Construction & Forestry Company, improperly identified as John Deere Construction & Forestry, Inc., make the following corporate disclosure:

1. Defendant Deere & Company is a publicly held corporation traded on the New York Stock Exchange under the ticker symbol “DE.”
2. John Deere Company is named as a defendant in this action but was merged into Deere & Company in 1992 and ceased to separately exist.
3. Defendant John Deere Construction & Forestry Company is a subsidiary of publicly-held Deere & Company and is not traded publicly.
4. Deere & Company has no parent corporation.

5. To the best of Deere & Company's knowledge, there are no publicly traded companies that own 10% or more of the stock of Deere & Company. No publicly-traded company owns 10% or more of the stock of John Deere Construction & Forestry Company

Dated: May 27, 2022

Respectfully submitted,

/s/ Reid C. Carpenter

*One of the Attorneys for Defendants
Deere & Company and
John Deere Construction & Forestry Company*

OF COUNSEL:

Reid C. Carpenter
rcarpenter@lightfootlaw.com
Amaobi J. Enyinnia
aenyinnia@lightfootlaw.com
LIGHTFOOT, FRANKLIN & WHITE, LLC
The Clark Building
400 20th Street North
Birmingham, Alabama 35203
205-581-0700 (phone)

CERTIFICATE OF SERVICE

This is to certify that on this 27th day of May, 2022, a true and correct copy of the foregoing was served on all following counsel of record in accordance with the Federal Rules of Civil Procedure:

Richard H. Taylor
Joseph S. Dennis
TAYLOR MARTINO, PC
455 Saint Louis Street
Suite 2100, P.O. Box 894
Mobile, Alabama 36601
richardtaylor@taylormartino.com
joseph@taylormartino.com
Attorneys for Plaintiff

Mark A. Newell
ARMBRECHT JACKSON LLP
RSA Tower, 27th Floor
11 North Water Street
Mobile, AL 36602
P.O. Box 290
Mobile, AL 36601
man@ajlaw.com
Attorneys for the Beard Defendants

/s/ Reid C. Carpenter
Of Counsel